

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

SCOTT TURNAGE , CORTEZ D.
BROWN, DEONTAE TATE, JEREMY S.
MELTON, ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, TERRENCE DRAIN, and
KIMBERLY ALLEN on
behalf of themselves and all similarly
situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity and in his
official capacity as the Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual
capacity and in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE
MCGHEE, in her individual capacity and in her
official capacity as the Assistant Chief of Jail Security
of Shelby County, Tennessee; DEBRA HAMMONS,
in her individual capacity and in her official capacity
as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality; and TYLER
TECHNOLOGIES, INC., a foreign corporation,

Defendants.

**Civil Action No. 2:16-cv-02907-SHM-
tmp**

(Hon. Judge Samuel H. Mays)

**DEFENDANTS BILL OLDHAM, ROBERT MOORE, CHARLENE MCGHEE, SHELBY
COUNTY, TENNESSEE’S MOTION TO EXTEND TIME TO RESPOND**

Defendants Bill Oldham, Robert Moore, Charlene McGhee, Shelby County, Tennessee

(“Shelby County Defendants”) file its Motion to Extend Time to Respond, stating:

1. On July 30, 2018, above-named plaintiffs filed their Third Amended Class Action Complaint (“Complaint”).
2. The deadline to respond to the Complaint is Monday, August 20, 2018.

3. Shelby County Defendants respectfully request an additional 30 days to respond to the Complaint.

4. Rule 6(b) of the Federal Rules of Civil Procedure states that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time....” Fed. R. Civ. P. 6(b)(1)(A).

5. Shelby County Defendants submit that good cause exists for its request. Shelby County Defendants seeks additional time to investigate the additional allegations alleged in the Complaint as well as potential third party claims.

6. On August 17, 2018, Counsel for Shelby County Defendants consulted with counsel for the above-named plaintiffs as well as Defendant Tyler Technologies, Inc. (“Tyler”) regarding this request for extension of time. Defendant Tyler does not oppose this Motion. Counsel for plaintiffs have stated its objection to this Motion.

WHEREFORE, PREMISES CONSIDERED, Shelby County Defendants respectfully request that the Court extend the subject response deadline to Wednesday, September 19, 2018.

Respectfully submitted,

/s/ Odell Horton, Jr.

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Counsel for Shelby County Defendants

CERTIFICATE OF CONSULTATION

On August 17, 2018, the counsel for the parties conferred via e-mail and telephone regarding the matters set forth in this Motion. Defendant Tyler does not oppose this Motion. Plaintiffs oppose this Motion.

/s/ Odell Horton, Jr. _____

CERTIFICATE OF SERVICE

The undersigned certifies that on August 17, 2018, a true and correct copy of the foregoing has been served upon the following counsel, via the Court's ECF filing system:

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